

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PAUL CONNORS,

Case No. 1:21-cv-04953

Plaintiff,

-against-

AMOREPACIFIC US, INC., INSPERITY
PEO SERVICES, L.P., RAYMOND
KYUNGKOOK KIM, and JAE KYUNG
SHIM,

Defendants.

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**DEFENDANT INSPERITY PEO SERVICES, L.P.'S INITIAL DISCLOSURES PURSUANT
TO RULE 26**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), defendant Insperity PEO Services, L.P. ("Insperity"), through its undersigned counsel, make the following Initial Disclosures.

The following disclosures are based on information presently known and reasonably available to Insperity, and which Insperity reasonably believes it may use in support of its defenses. However, ongoing discovery may require Insperity to amend these Initial Disclosures, which Insperity hereby reserves the right to do.

By providing these Initial Disclosures, Insperity does not purport to have identified every document, tangible thing or witness possibly relevant to this action. Insperity does not, by these Initial Disclosures or otherwise, waive any right to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures on any grounds, including competency, privilege, relevancy and

materiality, hearsay, undue burden, and confidentiality. These disclosures shall not constitute an admission or admissions regarding any matter.

I. Individuals Likely to Have Discoverable Information

Individuals likely to have discoverable factual information that Insperity may use to support its defenses in the above-referenced lawsuit, excluding those whose testimony may be used solely for impeachment, include:

1. Paul Connors: Mr. Connors is the Plaintiff in this action and may have knowledge concerning the allegations in the Complaint. On information and belief, Plaintiff's address and telephone number are known to his attorney.
2. Robin Na: Mr. Na is the President of defendant AMOREPACIFIC US, Inc. ("APUS") and may have knowledge concerning the allegations of the Complaint, including but not limited to the decision to eliminate Plaintiff's position as part of a company-wide RIF. Mr. Na may be contacted only through APUS's attorneys.
3. Jae Kyung Shim: Mr. Shim is a Defendant in this action and may have knowledge concerning the allegations in the Complaint, including but not limited to the allegations concerning him. Mr. Shim is no longer employed by APUS and Insperity does not have current contact information for Mr. Shim. On information and belief Mr. Shim's last known address is 21 W 86th St Apt 6H, New York, NY 10024, 917-575-2324.
4. Raymond Kyungkook Kim: Mr. Kim is a Defendant in this action and may have knowledge concerning the allegations in the Complaint, including but not limited to the allegations concerning him. Mr. Kim is no longer employed by APUS and Insperity does not have current contact information for Mr. Kim. On information and belief Mr. Kim's last known address is 4610 Center Blvd Apt 2320, Long Island City, NY 11109, 917-885-2049.
5. Julie Heinsohn: Ms. Heinsohn is a Senior Human Resource Specialist employed by Insperity and may have knowledge concerning the

allegations in the Complaint, including the investigation into Plaintiff's purported complaints. Ms. Heinsohn may be contacted only through the office of the undersigned attorneys.

6. Andrea Pendergraft: Ms. Pendergraft is an EEO Specialist employed by Insperity and may have knowledge concerning the allegations in the Complaint, including the investigation into Plaintiff's purported complaints. Ms. Pendergraft may be contacted only through the office of the undersigned attorneys.
7. Jina Hong: Ms. Hong is a former employee of APUS and was head of Human Resources ("HR") for APUS during Plaintiff's tenure and may have knowledge concerning the allegations of the Complaint, including but not limited to purported complaints raised by Plaintiff and the investigation of same. Insperity does not have current contact information for Ms. Hong. On information and belief Ms. Hong's last known address is 96 Waterside Dr, Little Ferry, NJ 07643, 267-918-8101.

II. Documents

Documents, electronically stored information, and tangible things that Insperity currently has in its possession, custody, or control which may be used to support its defenses, excluding those materials which would be used solely for impeachment, include:

- Documents relating to Plaintiff's employment with APUS and/or co-employment with Insperity;
- Documents relating to Plaintiff's alleged complaints to APUS and investigation of same by Insperity;
- Documents relating to Plaintiff's termination of co-employment with Insperity;
- Additional documents pertaining to the claims and defenses in this matter.

The above documents are located at the offices of Insperity and/or its counsel.

III. Computation of Damages

Insperity denies liability for damages and does not seek recovery of damages from the Plaintiff herein.

IV. Insurance

The relevant insurance policy will be produced.

Dated: August 5, 2021
New York, New York

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